

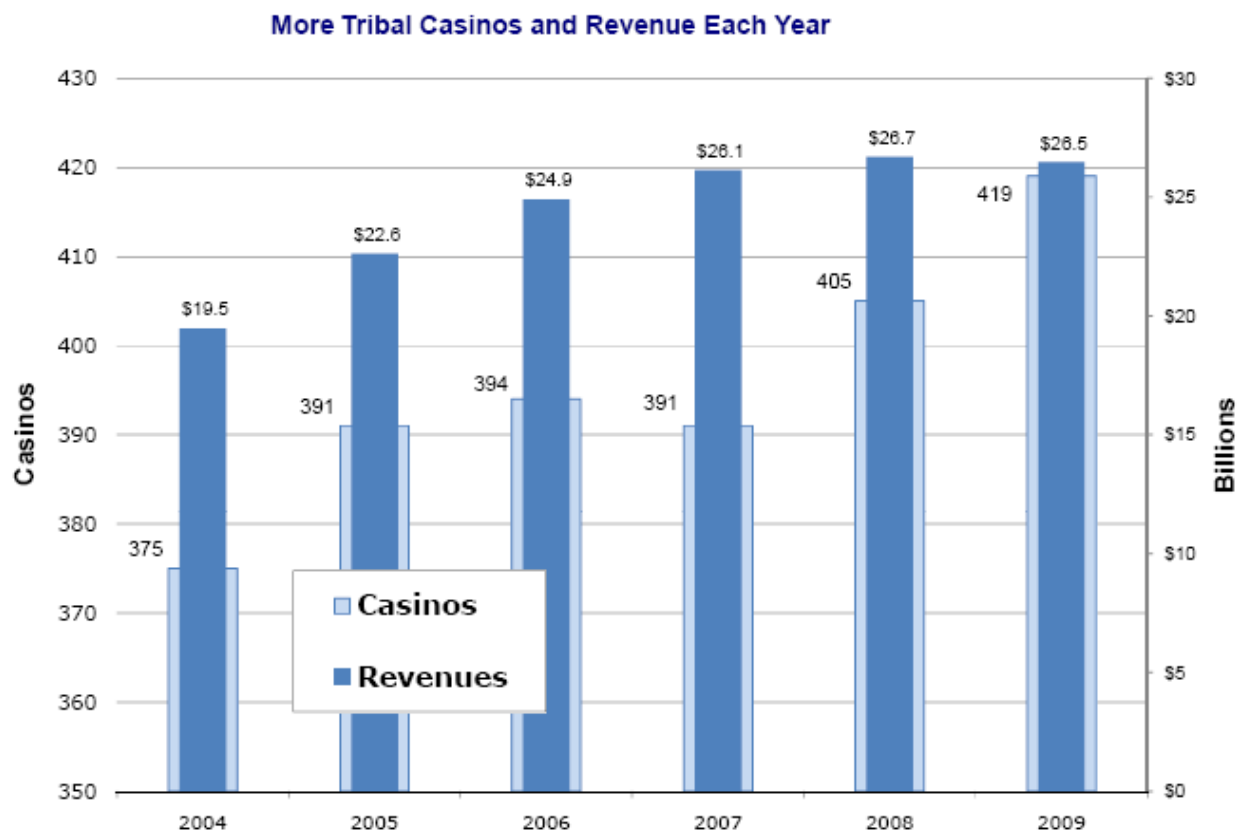
Tribal Casino Pollution Prevention

BEST MANAGEMENT PRACTICES/P2 RESOURCE LIST



Introduction

There are more than 400 gaming facilities in the U.S. and the number and collective size of the industry has increased steadily in recent years. The hospitality and gaming industries are resource-intensive operations and generate many waste streams from the multi-function facilities. Consequently, tribal casinos often have a large "environmental footprint."



National Indian Gaming Commission

<http://www.nigc.gov/LinkClick.aspx?fileticket=1k4B6r6dr-U%3d&tabid=67>

The large and growing tribal casino sector consume large amounts of resources and generate many wastes – tribes increasingly are focusing effort on reducing their environmental footprint and in the process operating more efficiently and cost-effectively. In the following sections, the best management practices (BMPs) for tribal casinos are divided into four categories: (1) solid waste, (2) water use/wastewater generation, (3) energy use, and (4) hazardous materials/hazardous waste. The BMPs encompass operations and activities associated with the casinos, lodging, and dining.

BMPs/P2 RESOURCE LIST (continued)

Solid Waste

According to a California waste study, commercial industry collectively generates about half of the state's disposed waste stream

Primary Sources/Waste Streams	<ul style="list-style-type: none">• Food preparation• Food packaging• Hospitality items• Office paper, newspapers, phone books and directories• Construction and demolition (C&D) waste• Beverage containers• Shipping/receiving material (cardboard, plastic, pallets, etc.)• Fluorescent Lamps																																	
Waste Characterization	<p>Hotels/Lodging Waste Generation:</p> <ul style="list-style-type: none">• 5,049 pounds of waste/employee/year with less than 25% diverted• 97 lbs/cubic yard (CIWMB. 2006. Targeted Statewide Waste Study – Large Hotels: www.calrecycle.ca.gov/Publications/default.asp?pubid=1184).• 35 – 45% of municipal solid waste is from commercial sources (<i>EcoPurchasing Guide for Hotels and Motels</i>, 1993, University of Fla.)• Restaurants: 1 lb/seat/day, 17 lb/employee/day Hotels: 2-4 lbs/room/day of solid waste (<i>various CA studies</i> www.ciwmb.ca.gov/WasteChar/WasteGenRates/Service.htm)																																	
Solid Waste Composition	<p>Hotels/Lodging Waste Composition:</p> <table><tr><th>Component</th><th>CIWMB-2006¹</th><th>Mohegan -1997²</th></tr><tr><td>Food/organics</td><td>45.3%</td><td>37.5%</td></tr><tr><td>Grease</td><td></td><td>1%</td></tr><tr><td>Cardboard</td><td>6.8%</td><td>7%</td></tr><tr><td>Glass bottles and containers</td><td>5.3%</td><td>4.5%</td></tr><tr><td>Metal</td><td>3.1%</td><td>("commingled recyclables")</td></tr><tr><td>Paper</td><td>33.2%</td><td>50%</td></tr><tr><td>Plastic</td><td>7.8%</td><td>("trash")</td></tr><tr><td>C&D (Const & Demo)</td><td>5.0%</td><td></td></tr><tr><td>Other</td><td>0.3%</td><td>--</td></tr><tr><td></td><td>100%</td><td>100%</td></tr></table> <p>¹ CIWMB. 2006. Targeted Statewide Waste Study – Large Hotels www.calrecycle.ca.gov/Publications/default.asp?pubid=1184). ² EPA. April 2000. Waste Reduction Tips for Hotels/Casino in Indian Country. www.epa.gov/epaoswer/non-hw/tribal/pdf/txt/casinotips.pdf</p>	Component	CIWMB-2006 ¹	Mohegan -1997 ²	Food/organics	45.3%	37.5%	Grease		1%	Cardboard	6.8%	7%	Glass bottles and containers	5.3%	4.5%	Metal	3.1%	("commingled recyclables")	Paper	33.2%	50%	Plastic	7.8%	("trash")	C&D (Const & Demo)	5.0%		Other	0.3%	--		100%	100%
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BMPs/P2 RESOURCE LIST (continued)

BMPs/P2
Opportunities

General for Casinos – Solid Waste and Recycling:

U.S. Environmental Protection Agency. *Waste Reduction Tips for Hotels and Casinos in Indian Country*.

www.epa.gov/wastes/wycd/tribal/pdf/txt/casinotips.pdf

Food Waste:

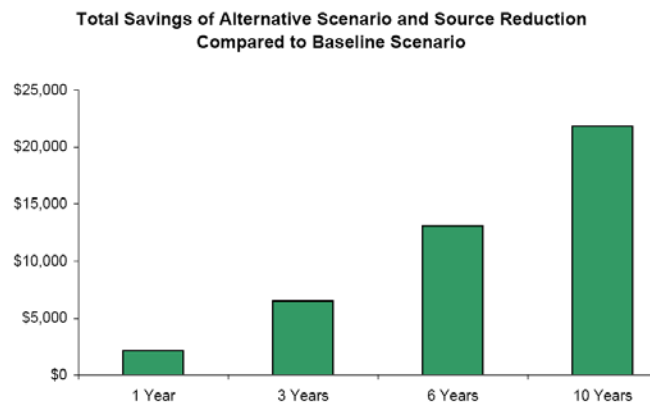
As hospitality venues, casinos prepare and serve food in multiple locations including restaurants, worker cafeterias, and hotel room service. Food service is often the largest casino function after gaming, and typically offer patrons food during most, if not all parts of the day and night. The largest component of the waste stream from food service is organic materials including food trimmings, post-consumer waste (e.g., plate scrapings), and disposable paper containers, and napkins.

Restaurants generate about 1 pound/seat/day or 17 pounds/employee/day of solid waste of which 37% is food waste. (CalRecycle, *Estimated Solid Waste Generation Rates for Service Establishments*.

www.ciwmb.ca.gov/WasteChar/WasteGenRates/Service.htm

- **EPA Food Waste Management Cost Calculator**, www.epa.gov/wastes/conservation/materials/organics/food/tools/index.htm

m: EPA developed this Microsoft Excel spreadsheet to help organizations estimate and compare the costs of alternatives to food waste disposal. The spreadsheet allows the user to input data specific to their circumstances including access to composting and kitchen grease vendors, and waste costs and calculates savings over multiple time periods (see example at right).



- **Green Seal GS-46, Standard for Restaurant and Foodservice Operations**, www.greenseal.org/certification/standards/gs46_restaurantfoodsvcs.cfm: Green Seal established GS-46 to delineate environmental standards for restaurants and food service operations for a variety of “key impact areas” including food waste. GS-46 identifies levels of environmental performance with specific goals and best practices. Particularly useful are the tools associated with the standard including a Waste Reduction and Management Plan to log food waste accomplishments in each standard requirement.
- **CalRecycle**, www.calrecycle.ca.gov/Publications/default.asp?cat=20: California’s guide to minimizing food waste from restaurants provides an overview and tips for each point of food waste generation from purchasing, handling and storage, preparation, and serving.

BMPs/P2 RESOURCE LIST (continued)

	<p>Recyclables:</p> <ul style="list-style-type: none"> Formalize a Recycling Program with staff training, data tracking, and auditing (EPA provides an overview of implementation steps. www.epa.gov/osw/conserved/rrr/recycle.htm) Where available, maximize use of municipal or commercial recycling programs; many offer free containers and pickup of recyclables and some allow commingling of recyclables. Diverting recyclables and compostables can reduce costs associated with landfill disposal of solid waste disposed. WasteWise: Consider joining this free, voluntary EPA program through which organizations eliminate costly municipal solid waste, benefiting their bottom line and the environment. www.epa.gov/epawaste/partnerships/wastewise/about.htm Recycle paper products, cardboard, glass, plastic, and metals. Commonly recyclable materials: www.epa.gov/osw/nonhaz/municipal/pubs/bus-guid/app-e.pdf Identify special waste streams that can be recycled, such as batteries, electronics, and fluorescent lamps. WasteWise electronics reuse and recycling: www.epa.gov/epawaste/inforesources/pubs/infocus/rif-c&d.pdf Set up a paper recycling program: www.epa.gov/waste/conserved/materials/paper/setting/schoolwork.htm#offices <p>C&D – Carpeting:</p> <ul style="list-style-type: none"> Environmentally preferable purchasing of carpet (U.S. EPA. 2006. Carpet Resources. www.epa.gov/opptintr/epp/pubs/products/carpet.htm). Green Seal offers a list of recommended carpet brands that manufacture and sell environmentally responsible consumer carpets. Carpet reclamation (U.S. Environmental Protection Agency. 2006. Carpet Resources. www.epa.gov/opptintr/epp/pubs/products/carpet.htm)
Greenhouse Gas Reductions	<p>Solid waste generation, disposal, and breakdown have large implications on greenhouse gas (GHG) emissions. Tribal casinos can calculate the GHG effect of their solid waste reduction and diversion efforts using various methodologies.</p> <p>EPA created the Waste Reduction Model (WARM, http://epa.gov/climatechange/wycd/waste/calculators/Warm_home.html) to help solid waste planners and organizations track and voluntarily report GHG emissions reductions from several different waste management practices. WARM calculates and totals GHG emissions of baseline and alternative waste management practices - source reduction, recycling, combustion, composting, and landfilling. The model calculates emissions in metric tons of carbon equivalent (MTCE), metric tons of carbon dioxide equivalent (MTCO2E), and energy units (million BTU) across a wide range of material types commonly found in municipal solid waste.</p>

BMPs/P2 RESOURCE LIST (continued)

Hazardous Material/Hazardous Waste

Primary Sources/Waste Streams	<ul style="list-style-type: none"> • Janitorial chemicals • Building maintenance chemicals • Construction/Demolition wastes (asbestos and lead) • Vehicle maintenance (hazardous chemicals, fuels, used oil, etc.) • Fertilizers and pesticides
Waste Characterization	<ul style="list-style-type: none"> • Janitorial - 1/3 of cleaning chemicals used today have harmful ingredients (Western Regional Pollution Prevention Network. Janitorial Products – Pollution Prevention Project. www.westp2net.org/Janitorial/workshop.cfm) • Building Maintenance – metal cleaners, glass cleaners, aerosol solvents, etc. • Vehicle Maintenance – brake cleaners, solvent parts washers, used oil, cleaners, used oil filters, etc.
BMPs/P2 Opportunities	<p>Janitorial products P2:</p> <p>Using green cleaning products in janitorial services offers better environmental performance and improved worker health and safety, while retaining the same sanitation quality as traditional, more chemical-intensive methods.</p> <ul style="list-style-type: none"> • EPA has outlined various approaches and tools for “Greening Your Purchase of Cleaning Products for Federal agencies casinos can use for their operations including various tools, resources, and purchasing guides. www.epa.gov/epp/pubs/cleaning.htm#pts • EPA has defined environmental attributes for cleaners: www.epa.gov/epp/pubs/products/cleanattribut.htm • Green Seal has developed standards for various cleaning products including general-purpose, restroom, glass, and carpet cleaners, for routine cleaning of commercial, office, and industrial facilities: www.greenseal.org/certification/cleaning_products.cfm • Case Study - Greening the Chumash Casino Resort: www.epa.gov/region09/waste/tribal/pdf/Greening-Tribal-Casino-Operations-SantaYnez.pdf <p>Vehicle maintenance P2:</p> <ul style="list-style-type: none"> • EPA Region 9 conducted a comprehensive review of chemical products used in vehicle maintenance facilities and prepared numerous factsheets, case studies, and videos outlining P2 techniques and technologies. www.epa.gov/region09/waste/p2/autofleet/index.html • Many vehicle maintenance fluids can be recycled, including used oil, transmission and brake fluid, and antifreeze. <p>Integrated Pest Management (IPM):</p> <ul style="list-style-type: none"> • IPM reduce the use of pesticides, an approach that relies primarily on non-chemical means such as controlling climate, food sources, and building entry points to prevent and manage pest infestation. www.epa.gov/osw/wyacd/tribal/pdf/txt/casinotips.pdf • Landscape with indigenous plants adapted to the local climate and rain patterns to reduce the need for additional chemical application.

BMPs/P2 RESOURCE LIST (continued)

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| | <ul style="list-style-type: none">• GreenScapes: www.epa.gov/greenschapes• Large scale landscaping: www.epa.gov/epawaste/conserve/rrr/greenschapes/lrgscl.htm• The Sustainable Sites Initiative: www.sustainablesites.org/• Landscaping with Native Plants: www.epa.gov/greenacres/• Integrated Pest Management Plan - Factsheet: www.epa.gov/opp00001/factsheets/ipm.htm <p>Hazardous Waste:</p> <ul style="list-style-type: none">• Batteries: www.epa.gov/osw/conserve/materials/battery.htm• Hazardous Waste Recycling: www.epa.gov/osw/hazard/recycling/index.htm• Universal Waste: Steps to Managing your Universal Waste Lamps in an Environmentally-Safe Manner: www.epa.gov/osw/hazard/wastetypes/universal/lamps/recycle.htm |
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BMPs/P2 RESOURCE LIST (continued)

Water Use/Wastewater Generation

Primary Sources/Waste Streams	<ul style="list-style-type: none">LandscapingBathroom fixturesFood ServiceBuilding Operation/Physical Plant																																										
Water Use	<ul style="list-style-type: none">The average water usage per occupied room per day is 218 gallons (University of Florida, Cooperative Extension Service and Energy Extension Service. <i>EcoPurchasing Guide for Hotels and Motels</i>. www.p2pays.org/ref/02/01784.pdf)Water consumption in the hospitality industry (Hagler Bailly Services, Inc., Bill Meade and Patricio Gonzalez-Morel. <i>Improving Water Use Efficiency in Hotels and Resorts Through the Implementation of Environmental Management Systems</i>. www.ucowr.siu.edu/updates/pdf/V115_A6.pdf) <p style="text-align: center;">Water efficiency benchmarks (International Hotels Environmental Initiative)</p> <table><tr><th rowspan="2">Property size</th><th colspan="4">Water use rating (figures are in US gallons/guest night)</th></tr><tr><th>Good</th><th>Fair</th><th>Poor</th><th>Very poor</th></tr><tr><td>< 50 rooms</td><td>< 116</td><td>116 - 134</td><td>134 - 154</td><td>> 154</td></tr><tr><td>50 - 150 rooms</td><td>< 154</td><td>154 - 178</td><td>178 - 213</td><td>> 213</td></tr><tr><td>> 150 rooms</td><td>< 176</td><td>176 - 226</td><td>226 - 259</td><td>> 259</td></tr></table> <p>Water Use Distribution in Hotels:</p> <table><tr><th>Water Use Area</th><th>Hagler Bailly</th></tr><tr><td>Guest Rooms</td><td>33%</td></tr><tr><td>Kithcens/Coldrooms</td><td>18%</td></tr><tr><td>Landscaping</td><td>15%</td></tr><tr><td>Public Bathrooms</td><td>15%</td></tr><tr><td>Laundry</td><td>11%</td></tr><tr><td>Building Operation</td><td>5%</td></tr><tr><td>Pool</td><td>3%</td></tr><tr><td></td><td>100%</td></tr></table>	Property size	Water use rating (figures are in US gallons/guest night)				Good	Fair	Poor	Very poor	< 50 rooms	< 116	116 - 134	134 - 154	> 154	50 - 150 rooms	< 154	154 - 178	178 - 213	> 213	> 150 rooms	< 176	176 - 226	226 - 259	> 259	Water Use Area	Hagler Bailly	Guest Rooms	33%	Kithcens/Coldrooms	18%	Landscaping	15%	Public Bathrooms	15%	Laundry	11%	Building Operation	5%	Pool	3%		100%
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BMPs/P2 RESOURCE LIST (continued)

BMPs/P2 Opportunities	<p>WaterSense, www.epa.gov/watersense is a voluntary partnership program operated by EPA that promotes water efficiency and supports implementation of product and practices that conserve water including at commercial facilities such as casinos. By adopting and promoting water-efficient products, services, and practices, water users can greatly reduce annual water and energy costs, as well as help reduce the stress on natural resources. www.epa.gov/WaterSense/spaces/ci.html</p> <p>Bathroom Fixtures:</p> <ul style="list-style-type: none">• Water saving bathrooms (faucets, toilets, urinals, showers, etc.) use only a fraction of the water required by older, less efficient fixtures. Casinos bathrooms often experience heavy customer usage and can operate 24 hours a day, 7 days a week. EPA provide WaterSense labeling based on third-party testing to meet EPA's specifications for water efficiency and performance. A list of qualified products is available at www.epa.gov/WaterSense/products/index.html. <p>Landscaping:</p> <ul style="list-style-type: none">• Landscape with indigenous plants adapted to the local climate and soil conditions to reduce the need for superfluous water application.• Use recycled water for landscaping.• Use composted mulch to retain soil moisture, control weeds, and reduce water use. Mulching is placing organic matter over the root zone of plants and trees and conserves water by reducing moisture evaporation from the soil and weed populations. (U.S. Environmental Protection Agency. <i>Environmentally Beneficial Landscaping – Learning to Balance Our Needs with Those of Future</i>. www.epa.gov/region02/ff/ebi.pdf) <p>Food Service:</p> <ul style="list-style-type: none">• Water efficient dishwashers• Sink aerators• Others <p>Building Operation/Physical Plant:</p> <ul style="list-style-type: none">• Condensate reuse on steam boilers
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BMPs/P2 RESOURCE LIST (continued)

Energy Use

Primary Sources/Waste Streams	<ul style="list-style-type: none"> • Heating/Ventilation/Air Conditioning (HVAC) • Kitchens • Lighting (casino) • Lighting (hotel and restaurants) • Building Operation (elevators, security systems, AV equipment, etc.) 																
Energy Use	<ul style="list-style-type: none"> • Casinos can use 5+ times as much energy per square foot (1,200,000 Btu/sq.ft./year) as the average large hospital (EnergyServices. March 2006. Casino Energy Management Fact Sheet. www.wapa.gov) • Breakdown of energy consumption in the hospitality and lodging industry (Energy and Environment Benchmark for Hotel Industry. 2006. Engineering). <table> <tr> <td>Space heating</td><td>31%</td></tr> <tr> <td>Water heating</td><td>17%</td></tr> <tr> <td>Cooling</td><td>15%</td></tr> <tr> <td>Lighting</td><td>20%</td></tr> <tr> <td>Kitchen</td><td>10%</td></tr> <tr> <td>Elevators</td><td>3%</td></tr> <tr> <td>Other</td><td>4%</td></tr> <tr> <td>Total</td><td>100%</td></tr> </table> • Laundering within the hospitality industry consumes around 2 - 5% of the total hotel electricity (Energy and Environment Benchmark for Hotel Industry. 2006. Laundry). 	Space heating	31%	Water heating	17%	Cooling	15%	Lighting	20%	Kitchen	10%	Elevators	3%	Other	4%	Total	100%
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BMPs/P2 Opportunities	<p>Lighting:</p> <ul style="list-style-type: none"> • Use most efficient lighting systems for application (occupancy sensors, energy efficient lamps/ballasts, etc.); Energy Star, lighting products: www.energystar.gov/index.cfm?c=lighting.pr_lighting • Institute policy of using compact fluorescents (CFL) throughout facility (casino, dining, meeting space, and lodging) instead of incandescent except for special cases. <p>Slot Machines:</p> <ul style="list-style-type: none"> • Replace existing fluorescent lamps with longer lasting and more efficient LED lamps, which can be a 50% savings rather than standard light bulbs. LED lamp retrofit kits are available, which are direct replacements of the fluorescent lamps and eliminate the fluorescent ballast. <p>Heating, Ventilation, and Air Conditioning:</p> <ul style="list-style-type: none"> • Maintain HVAC efficiency through monitoring and maintenance (The Pollution Prevention Resource Exchange. 2006. Hospitality: Operations. www.p2rx.org/topic hubs/subsection.cfm?hub=14&subsec=2&nav=2) • Install onsite energy generation or purchase green power electricity (U.S. 																

BMPs/P2 RESOURCE LIST (continued)

Environmental Protection Agency. 2006. Green Power Partnership. Buy Green Power. www.epa.gov/greenpower/buygp/index.htm

Hot Water Heaters/Boilers:

- Insulate all hot water pipes to maximize efficiency (Wisconsin Focus on Energy. 2006. *Controlling Energy Costs in Lodging Business – Fact Sheet*. www.focusonenergy.com/business/commercial-business/hotels/)
- Set hot water heaters used for domestic use no higher than 120 °F.
- Typically the hot water used for washing linens must be hotter than the water routed to individual lodging rooms, in order for the detergents and bleaches to be effective. Separate the hot water heaters that service the laundry washing machines from the lodging rooms, so that they can be set at different temperatures.

Swimming Pools/Hot Tubs:

- Only operate outdoor heated pools during the warm season and consider complete shutdown during off-peak season (only operating pump to circulate pool chemicals).
- Use an insulating pool cover after hours and during off season.
- Replace existing single-speed circulating pumps with variable-speed pumps.

Vendor information: www.pentaircommercial.com/

Energy savings calculator:

www.pentaircommercial.com/selectionguide/index.html

Appliances:

- Replace existing equipment with Energy Star rated appliances and machines.
- Maintain appliances and perform regular cleaning of cooling and heating elements/coils.
- Conduct cost/benefit analysis of appliances more than 10 years old including use of energy company rebates.

Energy Calculators:

EPA's Energy Star program provides energy calculators for numerous types of equipment to help make informed decisions about energy costs,

www.energystar.gov/index.cfm?c=bulk_purchasing.bus_purchasing:

- Clothes Washers
- Food Service Equipment: dishwashers, fryers, griddles, hot food cabinets, ice machines, ovens, refrigerators and freezers, steam cookers, and vending machines.
- Heating and Cooling Products
- Construction Products
- Consumer Electronics
- Office Products

BMPs/P2 RESOURCE LIST (continued)

Case Studies

Mohegan Sun Resort	<p>(TribalP2 Project Resources. Mohegan Tribe and Mohegan Sun Resort. 2004. Visionary Planning for the Seventh Generation. www.tribalp2.org/resourcequery.php?group=project_type&searchby=resourcetype_id&id=4&label=casinos www.p2pays.org/ref/37/36109.pdf)</p> <ul style="list-style-type: none"> • 3rd largest casino in the United States • Focused P2 effort on energy use, transportation, and food service <ul style="list-style-type: none"> ◦ Send more than 2,190 tons of food waste to a piggery each year • Model of saving money through energy and resource conservation <ul style="list-style-type: none"> ◦ Fuel cell technology ◦ Photovoltaics ◦ Heat pumps ◦ Infrared sensors for heating and lighting ◦ Recycling ◦ More than 44% of the solid waste stream is recycled
Chumash Casino Resort Santa Ynez, California	<p>Greening the Chumash Casino Resort: www.epa.gov/region09/waste/tribal/pdf/Greening-Tribal-Casino-Operations-SantaYnez.pdf</p> <ul style="list-style-type: none"> • Parking structure storm water collection • Gray water reuse • Low flow bathroom fixtures • Variable frequency drives • Energy efficient projects: air hand dryers, slot machine LEDs, energy management software • Green cleaning program: Green Seal certified cleaners, microfiber mops • Source separation and recycling • Customer and employee biodiesel shuttle buses
Eastern Band of Cherokee Indians of North Carolina, 1 casino and 3 restaurants	<p>www.tribalp2.org/resourcequery.php?group=project_type&searchby=resourcetype_id&id=4&label=casinos</p> <ul style="list-style-type: none"> • Composting program for wastewater treatment sludge, vegetative waste, and food waste • Collects approximately 1,200 lbs. of food waste per day and final product is distributed to landscapers, nurseries, and individual homes
Philadelphia's Sheraton Rittenhouse Square Hotel	<p>Greene-e. July 2002. Philadelphia's Sheraton Rittenhouse Square Hotel "Warms Up" to Green Power.</p> <ul style="list-style-type: none"> • Purchases 20,000 kilowatts a month of wind power, which represent 8% of the hotel's total electricity consumption • Replaced incandescent light fixtures with compact fluorescents and saved 78% in energy costs (Building Design and Construction. November 2006. <i>Green Buildings and the Bottom Line</i>)

BMPs/P2 RESOURCE LIST (continued)

Disney World, Florida	<p>Hotel Online Special Report, Ishmael Mensah. May 2004. Environmental Management Practices in US Hotels. www.hotel-online.com/News/PR2004_2nd/May04_EnvironmentalPractices.html)</p> <ul style="list-style-type: none">• Recycles 4 million gallons per day of wastewater for irrigation of landscaping and golf courses
Habitat Suites Hotel in Austin, Texas	<p>Practices in US Hotels. Hotel Online Special Report, Ishmael Mensah. May 2004. Environmental Management. www.hotel-online.com/News/PR2004_2nd/May04_EnvironmentalPractices.html)</p> <ul style="list-style-type: none">• Water conservation program using water saving fixtures• Energy savings using fluorescent lamps and air conditioning units saving 122,000 kilowatt-hour of energy per year